

US EPA ARCHIVE DOCUMENT



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

July 26, 2011

OFFICE OF
SOLID WASTE AND
EMERGENCY RESPONSE

VIA E-MAIL

Mr. Michael Menne, Vice President Environmental Services
Ameren Energy
One Ameren Plaza
1901 Chouteau Avenue
P.O. Box 66149
St Louis, Mo. 63166-6149

Dear Mr. Menne,

On September 29, 2010 the United States Environmental Protection Agency ("EPA") and its engineering contractors conducted a coal combustion residual (CCR) site assessment at the Rush Island Power Station facility. The purpose of this visit was to assess the structural stability of the impoundment or other similar management units that contain "wet" handled CCRs. We thank you and your staff for your cooperation during the site visit. Subsequent to the site visit, EPA sent you a copy of the draft report evaluating the structural stability of the unit at the Rush Island Power Station facility and requested that you submit comments on the factual accuracy of the draft report to EPA. Your comments were considered in the preparation of the final report.

The final report for the Rush Island Power Station facility is enclosed. This report includes a specific condition rating for each CCR management unit and recommendations and actions that our engineering contractors believe should be undertaken to ensure the stability of the CCR impoundment(s) located at the Rush Island Power Station facility. These recommendations are listed in Enclosure 2.

Since these recommendations relate to actions which could affect the structural stability of the CCR management units and, therefore, protection of human health and the environment, EPA believes their implementation should receive the highest priority. Therefore, we request that you inform us on how you intend to address each of the recommendations found in the final report. Your response should include specific plans and schedules for implementing each of the recommendations. If you will not implement a recommendation, please provide a rationale. Please provide a response to this request by August 23, 2011. Please send your response to:

Mr. Stephen Hoffman
U.S. Environmental Protection Agency (5304P)
1200 Pennsylvania Avenue, NW
Washington, DC 20460

If you are using overnight or hand delivery mail, please use the following address:

Mr. Stephen Hoffman
U.S. Environmental Protection Agency
Two Potomac Yard
2733 S. Crystal Drive
5th Floor, N-5838
Arlington, VA 22202-2733

You may also provide a response by e-mail to hoffman.stephen@epa.gov

You may assert a business confidentiality claim covering all or part of the information requested, in the manner described by 40 C. F. R. Part 2, Subpart B. Information covered by such a claim will be disclosed by EPA only to the extent and only by means of the procedures set forth in 40 C.F.R. Part 2, Subpart B. If no such claim accompanies the information when EPA receives it, the information may be made available to the public by EPA without further notice to you. If you wish EPA to treat any of your response as "confidential" you must so advise EPA when you submit your response.

EPA will be closely monitoring your progress in implementing the recommendations from these reports and could decide to take additional action if the circumstances warrant.

You should be aware that EPA will be posting the report for this facility on the Agency website shortly.

Given that the site visit related solely to structural stability of the management units, this report and its conclusions in no way relate to compliance with RCRA, CWA, or any other environmental law and are not intended to convey any position related to statutory or regulatory compliance.

Please be advised that providing false, fictitious, or fraudulent statements of representation may subject you to criminal penalties under 18 U.S.C. § 1001.

If you have any questions concerning this matter, please contact Mr. Hoffman in the Office of Resource Conservation and Recovery at (703) 308-8413. Thank you for your continued efforts to ensure protection of human health and the environment.

Sincerely,
/Suzanne Rudzinski/, Director
Office of Resource Conservation and Recovery

Enclosures

Rush Island Power Station Recommendations (from the final assessment report)

1.2.1 Recommendations Regarding the Structural Stability

Frequent inspections should be performed at least once per month during optimal weather conditions to monitor and record pool elevations. Pool elevations should also be monitored periodically after significant rain events to ensure pool elevation increases higher than the allowable 403 feet are reduced to 403 feet or less within an adequate time frame.

1.2.2 Recommendations Regarding the Hydrologic/Hydraulic Safety

The permit report recommends the operating water surface elevation of the ash pond should be no higher than 398 feet, and a full 27 acres of water surface should be available. Periodic monitoring of water surface elevations, not to exceed 398 feet, as well as identification and removal of ash deltas above a 398 foot elevation (limiting water surface acreage) is recommended to ensure hydrologic/hydraulic safety of the ash pond. The development of an operating procedure to monitor water elevation and maintain waste elevations is recommended.

1.2.3 Recommendations Regarding the Field Observations

It should be noted that although visual inspections of the ash pond embankment and outlet structure showed no visible signs of significant erosion, seepage, overstress, settlement, shear failure or other signs of instability, minor areas of concerns were noted. It is recommended that the utility monitor the erosion and seepage areas to ensure problems are not developing.

1.2.4 Recommendations Regarding the Maintenance and Methods of Operation

A need for slope maintenance for the external embankment is necessary to limit the growth of vegetation and facilitate visual dam inspection. It should be noted that in 2006, the Corps of Engineers armored with rip-rap the entire length of the Isle du Boise Creek bank adjoining the ash pond. Careful consideration should be taken in monitoring signs of erosion of the ash pond external embankment due to flood waters of either the Isle du Bois Creek or the Mississippi River.

1.2.5 Recommendations Regarding Continued Safe and Reliable Operation

No recommendations appear warranted at this time.